

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JAMES C. CHAMBERS, JR.

Plaintiff,

VS.

**BROOKDALE SENIOR LIVING
COMMUNITIES, INC., d/b/a
SOUTHERLAND PLACE ASSISTED
LIVING,**

Defendant.

Civil No. 2:16-cv-02999-SHL-cgc

JURY TRIAL DEMANDED

JOINT STIPULATION OF VOLUNTARY DISMISSAL WITH PREJUDICE

Defendant Brookdale Senior Living Communities, Inc., operating as Brookdale Germantown and incorrectly referred to as “d/b/a Southerland Place Assisted Living” (“Defendant”), and Plaintiff, James C. Chambers, Jr. (“Plaintiff”), by and through undersigned Counsel, hereby jointly stipulate that the above-captioned action should be and hereby is voluntarily dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

The Parties, as evidenced by the signatures of Counsel below, have settled all claims, and have stipulated to the dismissal with prejudice of the above-referenced action, each to bear its own costs and expenses, including attorney's fees and costs, except as outlined in the Parties' Settlement Agreement.

Respectfully submitted this the 7th day of November, 2017.

Respectfully submitted,

/s/ Emma J. Redden

ANGIE C. DAVIS

Tennessee Bar No. 20043

angiedavis@bakerdonelson.com

EMMA J. REDDEN

Tennessee Bar No. 33501

eredden@bakerdonelson.com

BAKER, DONELSON, BEARMAN,

CALDWELL & BERKOWITZ, PC

First Tennessee Building

165 Madison Avenue, Suite 2000

Memphis, Tennessee 38103

901-577-8110 – telephone

*Attorneys for Defendant, Brookdale Senior Living
Communities, Inc., d/b/a Southerland Place
Assisted Living*

/s/ Kristy L. Bennett (w/ perm. Emma J. Redden)

Kristy L. Bennett BPR #30016

Tressa V. Johnson BPR #26401

JOHNSON AND BENNETT, PLLC

1331 Union Avenue, Suite 1226

Memphis, TN 38104

(901) 402-6830 (direct)

(901) 462-8629 (fax)

kristy@myjbfirm.com

tressa@myjbfirm.com

Attorneys for Plaintiff, James C. Chambers, Jr.